

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

AIR LINE PILOTS ASSOCIATION,
INTERNATIONAL

Plaintiff,

v.

FRONTIER AIRLINES, INC.,

Defendant.

Case No. 1:18-cv-05089

Hon. Charles R. Norgle, Sr.
Magistrate Judge M. David
Weisman

DEFENDANT FRONTIER AIRLINES, INC.'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S COMPLAINT

Defendant Frontier Airlines, Inc. ("Frontier"), through undersigned counsel, hereby respectfully moves this Court for the entry of an Order extending the deadline for Frontier to answer, move, or otherwise respond to Plaintiff's Complaint to November 9, 2018, and in support thereof states as follows:

1. Plaintiff Air Line Pilots Association, International ("ALPA") filed its Complaint on July 25, 2018. (Dkt. #1). Frontier waived service on July 25, 2018. (Dkt. #7).
2. Frontier respectfully requests that this Court enter an Order extending the deadline for Frontier to answer, move, or otherwise respond to ALPA's Complaint to November 9, 2018.
3. This is the first request for an extension of time to answer, move, or otherwise respond to ALPA's Complaint.
4. The present motion is not brought for purpose of delay.

5. In the event Frontier's response to the Complaint is a motion pursuant to Rule 12 of the Federal Rules of Civil Procedure, Frontier agrees that ALPA's opposition brief will be due on December 14, 2018, and that Frontier's reply brief will be due on January 15, 2019.

6. Counsel for Frontier has been authorized by ALPA's counsel to represent that ALPA does not oppose the requested extension and briefing schedule set forth above.

WHEREFORE, Defendant, Frontier Airlines, Inc., respectfully requests that this Court enter an Order extending the deadline to answer, move, or otherwise respond to Plaintiff's Complaint to November 9, 2018, and for any other such relief that the Court deems just.

Dated: September 24, 2018.

Respectfully Submitted,

/s/ Larry S. Kaplan

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Frontier Airlines, Inc.*

CERTIFICATE OF SERVICE

The undersigned certifies that, on September 24, 2018, pursuant to Fed. R. Civ. P. 5 and LR 5.5, a true and correct copy of the foregoing Defendant Frontier Airlines, Inc.'s Unopposed Motion for Extension of Time to Respond to Plaintiff's Complaint was filed with the Clerk of Court using the CM/ECF System, which will send notification of such filing to the attorneys of record at the email addresses on file with the court.

/s/ Larry S. Kaplan

Larry S. Kaplan